

EXHIBIT NO. 2: MORRISON MAHONEY LLP PART II

MORRISON MAHONEY LLP**250 SUMMER STREET****BOSTON, MA 02210****(617) 439-7500****FEDERAL ID # 04-2262762**

June 30, 2007

LEISNOI, INC.
 305-127 NORTH RED MOUNTAIN
 MESA, AZ 85207

ATTN: CAROLE PAGANO
 TREASURER

CLIENT #/MATTER #: 011658/10024978
 INVOICE #: 659417
 CUT-OFF DATE: June 30, 2007

PREVIOUS BALANCE: \$27,898.41

CURRENT FEES: 19,638.00

CURRENT EXPENSES: 364.60

CURRENT INVOICE TOTAL: \$20,002.60

TOTAL INVOICE AMOUNT: \$47,901.01

LEISNOI, INC./DECERTIFICATION

INVOICE PAYABLE UPON RECEIPT. REFER TO
 OUR INVOICE NUMBER WITH YOUR REMITTANCE.

FEES

DATE	TKID	HOURS	DESCRIPTION
5/30/07	JRF	0.1	Check federal district court's docket sheet for any activity by Stratman, whose brief is due today but apparently has not yet filed.
5/31/07	JRF	0.4	Receive and study affidavit of Michael Schneider and motion for extension of time in which to file through June 11th, evaluating futility in opposing the extension of time to oppose the motions to dismiss, but determining that the motion also seeks leave to file a cross-motion to decertify Leisnoi, such that Leisnoi

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			should urge the Court to reject Stratman's proposed order, and restrict Stratman to opposing the jurisdictional motions rather than being allowed to cross-move on the merits.
5/31/07	JRF	0.4	Reviewing Judge Singleton's orders on the scope of briefing to be allowed, assessing grounds for structuring an argument that Stratman's motion for extension of time seeks impermissibly to expand the scope of what he is allowed to file, formulating strategy for Leisnoi's response.
5/31/07	JRF	1.4	Draft Leisnoi's response to Omar Stratman's motion for extension of time, arguing that while Stratman can be given through June 11th to file his opposition to motions to dismiss, the Court has previously restricted briefing just to jurisdictional issues and this structure should not be upset, such that the Court should reject the proposed order submitted by Stratman, and specify that Stratman is precluded from filing any cross-motions on substantive issues, but must instead restrict his briefing just to the jurisdictional challenges raised by Leisnoi, Koniag, and the Department of Justice.
5/31/07	JRF	0.1	Receive and review email from counsel for the Dept. of Justice regarding his concerns about Stratman's motion, and desire for a conference call to discuss.
5/31/07	JRF	0.4	Lengthy TC with attorney Bruce Landon regarding persuaded him also to oppose Stratman's effort to obtain leave of court to file a cross-motion, and discussed status of briefing, the issue of the impact of the U.S. v. Henri case on the pending decertification case, and subject matter jurisdiction.
5/31/07	JRF	0.0	Called attorney Collin Middleton to discuss the latest motion by Stratman, and the comments and concerns voiced by Bruce Landon (no charge).
6/1/07	JRF	0.5	Lengthy TC with Collin Middleton regarding Stratman's underhanded effort to try to obtain leave of court to file a cross-motion on the merits; ongoing state-court suit Koniag has against Stratman for his breach of settlement agreement; upcoming retirement of the Department of Justice's lead counsel; the five pending motions to dismiss for lack of jurisdiction; status of the 2002 suit.
6/1/07	JRF	0.1	Receive and review email from Collin Middleton

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			regarding Stratman's pending motion.
6/2/07	JRF	0.1	Receive and review motion by Dept. of Justice for extension of time in which to answer Stratman's complaint in the 2002 suit pending a ruling on jurisdictional motions.
6/2/07	JRF	0.1	Receive and review Omar Stratman's response to Dept. of Justice's motion for extension of time to answer complaint.
6/2/07	JRF	0.1	Receive and review Koniag's conditional non-opposition to Omar Stratman's motion for extension of time to file briefs on jurisdictional issues.
6/6/07	JRF	0.1	Receive and review order granting Stratman's motion for extension of time to oppose pending motions, and also to file cross-motions, by June 11th.
6/6/07	JRF	0.2	Evaluate whether Judge Singleton's order permits Stratman to file substantive briefing on the number of Natives on Woody Island; the village physical characteristics, and various matters that go beyond jurisdictional matters, assessing how that will affect the scope of the case.
6/9/07	JRF	0.1	Receive and review motion by Dept. of Justice to extend the time in which all defendants, including Leisnoi, may respond to Stratman's briefs that are due on June 11th.
6/11/07	JRF	2.0	Studying briefing submitted today by Omar Stratman opposing Leisnoi's motion that argued the doctrine of administrative finality attached to the ANCAB ruling entered in favor of Leisnoi from which Stratman failed to appeal, evaluating his argument that the case should be narrowly construed to apply only to land selection and not to eligibility and studying his attachments that reflect he tried to make that case encompass eligibility issues.
6/12/07	JRF	2.0	Receive and study Omar Stratman's briefing in opposition to Leisnoi's argument that the doctrine of collateral estoppel applies to the unappealed ANCAB ruling in the Holdworth, Citizens Action Group, Sierra Club case to which Stratman was not a party, evaluating his arguments that he should not be deemed to be in privity with the parties to that case, and his legal analysis as to the elements of collateral estoppel allegedly not having been met, determining that some

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			legal research will be needed on the cases Stratman has cited and to work around his arguments.
6/12/07	JRF	0.0	TC with Ms. Carole Pagano regarding flurry of activity in the decertification case, with Stratman having filed a large number of briefs as well as a motion seeking to decertify Woody Island and obtain injunctive relief as well as nullification of land patents; need to research his cases and legal theories, then draft replies and an opposition (no charge).
6/12/07	JRF	2.9	Researching collateral estoppel issues raised by Mike Schneider in his briefs, and jurisprudence that can be used to undercut his legal arguments.
6/12/07	JRF	1.3	Reviewing briefing filed before the Interior Board of Land Appeals, assessing how to weave some arguments into current round of briefing in federal court.
6/13/07	JRF	0.1	Receive and review order by Judge Singleton setting deadline of July 13th for responses by defendants to Stratman's oppositions and motion.
6/13/07	JRF	3.4	Research cases interpreting issue of whether an involuntary dismissal such as the ANCAB's dismissal of Philip Holdsworth's challenge to Woody Island's eligibility operates as an adjudication on the merits for purposes of res judicata or collateral estoppel, evaluating how best to use this line of authority to respond to Stratman's argument about dismissal of Holdsworth from the ANCAB Leisnoi case prior to issuance of final ruling in favor of Leisnoi, and how to argue the ruling is entitled to preclusive effect.
6/13/07	JRF	4.9	Drafting several major sections to Leisnoi's Reply to Opposition to Motion to Dismiss regarding administrative finality, and collateral estoppel.
6/14/07	JRF	2.4	Evidentiary review of exhibits introduced at the IBLA, with particular focus on the BIA's exhibits, including briefing filed in Stratman's ANCAB case as well as Philip Holdsworth's challenge to Woody Island's eligibility, evaluating which evidence is useful to the collateral estoppel and administrative finality motions, assessing how best to utilize the evidence to undercut Stratman's opposition.
6/14/07	JRF	0.2	Review of local rules of District of Alaska for procedural issue of filing exhibits for first time on a reply brief,

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			determining that leave of court will be required.
6/14/07	JRF	5.3	Drafting additional portions of Leisnoi's Reply to Opposition to Motion to Dismiss regarding Administrative Finality and Res Judicata, raising numerous legal arguments why Omar Stratman is precluded from challenging Woody Island's eligibility for benefits under the Alaska Native Claims Settlement Act, detailing the collateral estoppel consequence flowing from the ANCAB ruling in favor of Leisnoi in the appeal brought by Philip Holdsworth, and the administrative finality that results from the ANCAB ruling in the land selection appeal brought by Stratman, integrating the analysis with various citations to and discussion of helpful caselaw.
6/14/07	JRF	0.6	Cross-reference factual statements in the reply brief to pin cites to BIA exhibits introduced at the IBLA.
6/14/07	JRF	0.5	Draft Local Rule 7.1(h)(2) Motion for Leave to File Certain Exhibits with Reply Brief, and proposed Order.
6/18/07	JRF	1.6	Receive and study Omar Stratman's brief in opposition to Leisnoi's motion to dismiss for lack of judicial standing and lack of administrative standing, evaluating his legal arguments, and formulating strategy for a response.
6/18/07	JRF	3.5	Research legal issues raised by Stratman in opposing Leisnoi's 12(b)(2) motion to dismiss that argues he lacks both administrative standing as well as judicial standing, reviewing the code of federal regulations as they existed when Leisnoi was first certified as well as the amended version in place when the Secretary most recently ruled, also studying IBLA case authorities cited by Stratman in his brief, evaluating how to avoid the legal problems Stratman identified, and how best to distinguish the Minchumina case upon which he relies.
6/19/07	JRF	1.7	Study the trial transcripts from the FED case tried before Judge Shortell, as well as transcript of deposition of Omar Stratman taken in that case, locating and evaluating useful testimony and exhibits showing Stratman no longer personally owns his ranch, having sold it to Northland Ranches, Inc., evaluating how Leisnoi can use this to challenge Stratman's standing, and to respond to Stratman's opposition to motion to dismiss for lack of standing, and to distinguish one of

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			the main cases upon which he relies, the Minchumina Homeowner's Association case, by demonstrating that those homeowners had standing under the pertinent CFR provision because they owned real property next to the land patented to the Native Group, whereas in this case, Stratman no longer owns the ranch, and his grazing lease has expired.
6/20/07	JRF	1.8	Review of IBLA published decisions addressing what showing must be made by a protestant appealing to the IBLA from an adverse decision by an administrative officer of the Department of the Interior, assessing how best to use the caselaw against Omar Stratman.
6/20/07	JRF	6.2	Draft Reply to Opposition to Motion to Dismiss for Lack of Subject Matter Jurisdiction Re: Lack of Administrative Standing and Lack of Judicial Standing.
6/20/07	JRF	0.4	Lengthy TC with Collin Middleton regarding his ideas for how best to structure arguments responding to and overcoming Stratman's legal arguments on administrative standing, and coordinating a response to Stratman's cross-motion on the merits.
6/21/07	JRF	3.2	Legal research and analysis of the various cases cited by Omar Stratman and legal arguments he raised in his Opposition to Motion to Dismiss for Lack of Federal Subject Matter Jurisdiction regarding: Mootness Resulting from Congressional Ratification in the Federally Recognized Indian Tribe List Act, studying his brief, and evaluating how best to distinguish the cases and work around his line of authorities to demonstrate that Congress statutorily confirmed Woody Island's certification as an ANCSA Native Village by adopting the Tribal Entities List that listed Woody Island as a federally recognized Alaskan tribe.
6/21/07	JRF	4.5	Draft Leisnoi, Inc.'s Reply to Opposition to Motion to Dismiss for Lack of Federal Subject Matter Jurisdiction regarding Mootness Resulting from Congressional Ratification in the Federally Recognized Indian Tribe List Act.
6/22/07	JRF	0.4	Lengthy TC with Bruce Landon at the Dept. of Justice regarding Omar Stratman's pending motions and his oppositions, coordinating defense positions responsive thereto, procedural issues, and also discussed preclusive effect that may arise from Judge Joannides' ruling in the

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			state court case once it gets reduced to a final judgment.
6/22/07	JRF	1.8	Receive and study Stratman's 49 page brief on issue of statute of limitations and mootness, evaluating his legal arguments and assessing flaws in reasoning, identifying areas where we will need to conduct legal research on a host of cases and doctrines he cites, in order properly to respond.
6/22/07	JRF	0.4	Review transcript from proceedings before the Ninth Circuit panel, assessing how the panel's comments from the bench can be used to rebut allegations made by Stratman in his opposition brief on the statute of limitations issue.
6/22/07	JRF	0.7	Evaluate stack of exhibits Stratman appended to his opposition to the statute of limitations and mootness motion, assessing how his reliance on the 1998 opinion by the Alaska Supreme Court weakens his brief now that Judge Joannides has granted summary judgment in the state court quiet title case.
6/22/07	JRF	0.2	Review Stratman's motion for leave to file overlength brief, assessing whether, as a practical matter, it may be best simply to allow the overlength brief rather than contest the filing of same.
6/23/07	JRF	3.8	Research and analysis of caselaw cited in Omar Stratman's 49 page brief, evaluating how he has overstated some holdings, misstated others, and tried to twist the caselaw to suit his purposes, assessing how to use some of the holdings against him, and what needs to be clarified when Leisnoi files with the Court its reply brief.
6/24/07	JRF	1.4	Revise and edit reply brief on lack of judicial standing and lack of administrative standing.
6/24/07	JRF	1.5	Revise and edit Leisnoi's reply brief regarding ratification of Woody Island's village status through enactment of the Federally Recognized Indian Tribe List Act.
6/25/07	JRF	0.5	Lengthy TC with Bob Mothershead regarding impact Judge Joannides' ruling could have in the decertification case, and discussed legal arguments Stratman has raised in his opposition briefs.
6/25/07	JRF	7.0	Draft multiple sections of argument in Leisnoi's reply

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DATE	TKID	HOURS	DESCRIPTION
			brief regarding statute of limitations; no jurisdiction under the APA; and mootness.
6/26/07	JRF	1.7	Researching nuances of primary jurisdiction doctrine as applied in the Ninth Circuit, compared with other circuits, and evaluate how Stratman's reliance on out-of-circuit authorities is therefore misplaced.
6/26/07	JRF	1.4	Legal research and analysis regarding Stratman's effort to plead around the 2 year ANCSA statute of limitations set forth in 43 U.S.C. 1632(a), and how best to defeat his effort to do so, and thereby restrict his ability to use the 2002 suit as a vehicle to challenge the 1974 village eligibility determination.
6/26/07	JRF	5.8	Draft multiple additional legal arguments in Leisnoi's Reply brief arguing that the statute of limitations has lapsed in which Stratman could challenge the 1974 village eligibility determination, that any review of the 2006 Secretarial ruling is moot because it is too late to affect Woody Island's certification; and that federal jurisdiction is absent under the Administrative Procedures Act as applied to the 2002 federal decertification suit, demonstrating the flaws and mistaken premises to Omar Stratman's contrary position.
6/27/07	JRF	5.3	Complete a working draft of Reply to Opposition to Motion to Dismiss regarding: no jurisdiction under the Administrative Procedures Act; statute of limitations has lapsed in which Stratman could challenge the 1974 Village Eligibility decision of then-Secretary of the Interior Rogers C.B. Morton; and mootness of Stratman's claims.
6/27/07	JRF	2.2	Revise and edit legal arguments in Leisnoi's reply brief on issues of both administrative finality as well as the doctrine of collateral estoppel.
6/27/07	JRF	1.0	Evidentiary review of the administrative record, evaluating grounds to oppose Stratman's effort to compel the Secretary to lodge the entire record into the district court at this time.
6/28/07	JRF	3.0	Draft Leisnoi's Motion to Stay Briefing on Stratman's motion to try force the court to reach the merits of his challenge; memo in support; and proposed Order, and marshal exhibits in support of the motion.

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DATE	TKID	HOURS	DESCRIPTION
6/28/07	JRF	5.3	Revise and edit Leisnoi's briefs on collateral estoppel; administrative finality; mootness; lack of administrative standing; lack of judicial standing; ratification through the Federally Recognized Indian Tribe List Act, and also worked on motion for leave to file certain additional exhibits.
6/29/07	JRF	2.5	Complete drafting Leisnoi's Reply to Opposition to Motion to Dismiss regarding: lack of judicial standing and lack of administrative standing; finalize and proofread the brief; file same with the federal court.
6/29/07	JRF	1.7	Complete drafting Leisnoi's Reply to Opposition to Motion to Dismiss regarding Ratification through the Federally Recognized Indian Tribe List Act; finalize and proofread the brief; file it with the federal court.
6/29/07	JRF	1.7	Complete drafting Leisnoi's Opposition to Motion to Compel the Filing of the Complete Administrative Record; finalize and proofread the brief; file it with the federal district court.
6/29/07	JRF	2.5	Complete drafting Leisnoi's Reply to Opposition to Motion to Dismiss regarding: Administrative Finality; Collateral Estoppel; Mootness; finalize and proofread the reply; file it with the federal district court.
6/30/07	JRF	2.3	Complete drafting Leisnoi's Motion to Stay Briefing on Stratman's Motion to Review and Affirm IBLA Panel Ruling and Vacate 1974 Certification; Memo in Support; and Proposed Order; ensure all exhibits are properly marshaled; finalize and proofread the motion and supporting memo; file the motion and supporting documentation with the federal court.
6/30/07	JRF	2.4	Complete drafting Leisnoi's Reply to Opposition to Motion to Dismiss for Lack of Subject Matter Jurisdiction regarding Statute of Limitations; finalize and proofread the brief; file same with federal district court.

JOHN R. FITZGERALD	PARTNER	0.00 hrs @	0.00 =	0.00
JOHN R. FITZGERALD	PARTNER	109.10 hrs @	180.00 =	19,638.00

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TOTAL FEES 109.10 hrs = \$19,638.00

EXPENSE SUMMARY

Internal Photocopying	\$101.12
Lexis	\$263.48
TOTAL EXPENSES	<u>\$364.60</u>

ACCOUNTS RECEIVABLE

DATE	INVOICE #	INVOICE AMT.	LAST PAY DATE	TOTAL PAYMENTS	BALANCE DUE
02/28/07	651194	6,997.90		0.00	6,997.90
05/30/07	657162	20,900.51		0.00	20,900.51

BALANCE DUE ON PRIOR INVOICES \$27,898.41

INVOICE SUMMARY

PREVIOUS BALANCE:	\$27,898.41
CURRENT FEES:	19,638.00
CURRENT EXPENSES:	<u>364.60</u>
CURRENT INVOICE TOTAL:	<u>\$20,002.60</u>
TOTAL INVOICE AMOUNT:	<u><u>\$47,901.01</u></u>

MORRISON MAHONEY LLP
250 SUMMER STREET
BOSTON, MA 02210
(617) 439-7500

FEDERAL ID # 04-2262762

August 28, 2007

LEISNOI, INC.
 305-127 NORTH RED MOUNTAIN
 MESA, AZ 85207

ATTN: CAROLE PAGANO
 TREASURER

CLIENT #/MATTER #: 011658/10024978
 INVOICE #: 663060
 CUT-OFF DATE: July 31, 2007

PREVIOUS BALANCE:	\$20,002.60
CURRENT FEES:	7,605.00
CURRENT EXPENSES:	<u>2717.23</u>
CURRENT INVOICE TOTAL:	<u>\$10,322.23</u>
TOTAL INVOICE AMOUNT:	<u><u>\$30,324.83</u></u>

LEISNOI, INC./DECERTIFICATION

INVOICE PAYABLE UPON RECEIPT. REFER TO
 OUR INVOICE NUMBER WITH YOUR REMITTANCE.

FEES

DATE	TKID	HOURS	DESCRIPTION
6/28/07	BRD	0.4	Marshalling exhibits in preparation for filing various motions
7/2/07	JRF	1.7	Ensuring compliance with local rules for the four Reply briefs Leisnoi has lodged with the Clerk of Court, and with the Motion to Stay; downloading from the Clerk's office copies of all those briefs, with the Electronic Court Filing header proving same were accepted by the clerk's office; organize with the subject motions and oppositions; proof the documents; ensure all exhibits

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DATE	TKID	HOURS	DESCRIPTION
			referenced in the briefs were actually filed; arrange for binding to provide Judge Singleton chamber's copy per local rules.
7/2/07	BRD	3.2	Marshalling exhibits in anticipation of upcoming extensive motion deadline with federal court and related e-filing
7/9/07	JRF	0.7	Receive and study Omar Stratman's opposition to Leisnoi's motion to stay all briefing on the merits or lack of merits of Stratman's decertification quest pending a determination of jurisdiction and a possible remand back to the Secretary if the Court declines to affirm based upon ANILCA, evaluating how best to reply to this latest effort to force the court to start counting Natives who were on Woody Island in 1970.
7/9/07	JRF	2.5	Study Stratman's 69 page opposition to Leisnoi's motion on the key issue of whether ANILCA ratified Woody Island's eligibility, evaluating flaws in his legal arguments, assessing overstatements or mischaracterizations of law, and identifying areas in which research will be needed before Leisnoi can reply.
7/9/07	JRF	0.6	Lengthy TC with Bob Mothershead regarding briefing on the ANILCA issue; case authorities that may be useful in replying; issue of implied repeal raised by Stratman; also discussing the motion Stratman filed trying to have the court adopt the ALJ's recommended decision, and how best to fight same.
7/9/07	JRF	0.6	Lengthy TC with Collin Middleton regarding coordinating briefing and research on ANILCA issues to save our respective clients costs; avoiding duplication of efforts; discussed legal arguments advanced by Stratman, and how best to respond to same.
7/9/07	JRF	1.3	Develop legal arguments to raise in reply to Stratman's opposition to Leisnoi's ANILCA motion.
7/10/07	JRF	2.5	Legal research regarding case authorities cited and relied upon by Stratman in his 68 page brief on the ANILCA issue.
7/10/07	JRF	1.6	Studying briefing previously authored by Leisnoi, Koniag, and the federal defendant on the ANILCA issue.
7/10/07	JRF	4.9	Draft Leisnoi's Reply to Opposition to Motion to

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August 28, 2007

DATE	TKID	HOURS	DESCRIPTION
			Dismiss regarding: ANILCA ratification.
7/11/07	JRF	1.4	Studying large stacks of exhibits Stratman filed into the court records, determining which are pertinent to the section 1427 ratification issue and how Leisnoi can make use of them.
7/11/07	JRF	1.5	Prepare a bench book for Judge Singleton on the key ANILCA issue upon which Secretary Dirk Kempthorne based his ruling.
7/11/07	JRF	4.9	Drafting several sections of Leisnoi's reply brief on the issue of Stratman's effort to bypass further Secretarial review and immediately decertify Woody Island.
7/11/07	BRD	1.8	Marshalling exhibits for motion submissions with federal court
7/12/07	JRF	0.4	Review email from Brennan Cain requesting certain documentation from the IBLA file for his use in briefing on the ANILCA issue, then locate and gather the requested material and forward it to Brennan Cain.
7/12/07	JRF	0.3	Evaluating possible inconsistencies between Schneider's invocation of the joint defense privilege in state court, coupled with his denial in the federal suit of any involvement in the state court Erickson case.
7/12/07	JRF	2.4	Legal research regarding extent to which collateral estoppel or res judicata consequences of the state court quiet title ruling are affected by the pendency of a motion by Stratman for reconsideration or by an appeal to the Alaska Supreme Court, evaluating impact on the federal decertification case.
7/12/07	JRF	0.6	Legal analysis regarding how best to rebut Stratman's arguments that the federal court in the 2002 suit must immediately reach the decertification issue and proceed to the merits without further remand to the Department of the Interior.
7/12/07	JRF	0.4	Assess how to use the order dismissing the Stratman count in the Erickson suit to Leisnoi's advantage in the federal decertification case, by undercutting his arguments raised in Stratman's opposition to Leisnoi's motion to stay briefing, wherein he misstates the status of the Erickson case.
7/12/07	JRF	3.8	Draft additional portions of Leisnoi's Reply to Stratman's Opposition to Motion to Stay Briefing on

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August 28, 2007

DATE	TKID	HOURS	DESCRIPTION
			Stratman's Motion to Decertify Woody Island.
7/12/07	JRF	1.0	Complete work on Leisnoi's Reply brief, trying to stop the court from reaching the decertification issue; then proof and finalize the brief, and file it with the federal court.
7/13/07	JRF	0.2	Review Koniag's July 13th answer to Stratman's third amended complaint, and its assertion of a counterclaim against Stratman, assessing how the counterclaim could affect the litigation.
7/13/07	JRF	0.1	Receive and review email from Brennan Cain regarding briefing the ANILCA issue.
7/16/07	JRF	0.1	Receive and review Stratman's reply to Leisnoi's opposition to his motion to compel the filing of the complete administrative record.
7/16/07	JRF	0.1	Receive and review Koniag's motion to stay or dismiss Stratman's motion to affirm the IBLA panel ruling.
7/16/07	JRF	0.1	Receive and review Koniag's opposition to Stratman's motion to compel the federal defendant to lodge the complete administrative record.
7/16/07	JRF	0.1	Receive and review Koniag's motion for extension of time to reply to Stratman's opposition on the ANILCA motion.
7/16/07	JRF	0.1	Receive and review Koniag's reply brief on the FRITLA ratification motion.
7/17/07	JRF	0.3	Review federal defendant's motion to stay briefing on Stratman's motion to review and affirm the IBLA panel ruling, studying helpful case authorities cited by the Dept. of Justice that support Leisnoi's argument that Stratman's motion is premature and must be denied.
7/17/07	JRF	0.3	Review federal defendant's opposition to Stratman's motion to force the filing of the complete administrative record at this time, noting significance of the federal defendant joining in Leisnoi's argument that if the court does not affirm on the basis of ANILCA or dismiss for lack of jurisdiction, appropriate course of action is to remand back to the agency rather than having the court decide the certification issues in the first instance, checking cases cited by the federal defendant in its brief.
7/18/07	JRF	1.8	Study the Department of Justice's comprehensive July

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			17th Reply Brief demonstrating why ANILCA has ratified the eligibility of the Native Village of Woody Island for ANCSA benefits, and Koniag's July 17th brief on the ratification issue as well, evaluating the soundness of the legal arguments set forth therein, assessing responsiveness to the arguments Stratman had asserted, and noting how this briefing helps advance Leisnoi's legal interests.			
7/18/07	JRF	2.1	Legal research and analysis regarding a number of useful cases cited and discussed by the Department of Justice and by Koniag in their July 17th briefs, evaluating how the holdings of the cases rebut certain key legal assumptions underlying Stratman's ANILCA arguments.			
7/20/07	JRF	0.5	Evaluate pros and cons of having oral arguments on the various pending motions, then draft motion to grant a hearing with oral arguments on Leisnoi's five pending dispositive motions, and proposed order granting the request.			
7/20/07	JRF	0.1	TC with clerk of federal court regarding procedural question on e-filing a request for oral arguments, and what category the pleading should properly be classified under.			
7/25/07	JRF	0.1	Receive and review Stratman's request for oral arguments on his pending motions.			
JOHN R. FITZGERALD			PARTNER	39.10 hrs @	180.00 =	7,038.00
BENJAMIN R. DAVIS			LAW CLERK	5.40 hrs @	105.00 =	567.00
TOTAL FEES				44.50 hrs =		<u>\$7,605.00</u>

EXPENSE SUMMARY

Express Mail	\$314.80
Internal Photocopying	\$2,030.88
Long Distance Phone	\$0.39
Lexis	\$71.16

Invoice Number: 663060

August 28, 2007

Velobinding	\$100.00
Internal Scanning	\$200.00
TOTAL EXPENSES	<u>\$2,717.23</u>

ACCOUNTS RECEIVABLE

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06/30/07	659417	20,002.60		0.00	20,002.60
BALANCE DUE ON PRIOR INVOICES					\$20,002.60

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Date: 10/11/07 PRO FORMA STATEMENT AS OF 10/11/07 FOR FILE 10024973 PROFORMA INDEX#

---MATTER DESCRIPTION-----
LEISNOI, INC./DECERTIFICATION

-----BILLING INSTRUCTIONS-----

---CLIENT INFORMATION ---
LEISNOI, INC.

--CLIENT NUMBER--	--ORIGINATING--	--BILLING--	--SUPERVISING--
011658	01596 JRF	01596 JRF	01596 JRF
	J FITZGERALD	J FITZGERALD	J FITZGERALD

---CLIENT ADDRESS ---

LEISNOI, INC.
305 127 NORTH RED MOUNTAIN
MESA, AZ 85207

-----MATTER ADDRESS-----

-----MATTER INFORMATION-----
PHONE: 480 471 8213
REFERRED BY:

PHONE:
CONTACT:

STATUS: OP	RATE: 1	TEMPLATE: S1	MIN FEE:
DATE OPENED: 11/20/2006	DEPT: 004	TIME FORMAT: 0	MIN COST:
DATE CLOSED:	LOCATION: 01	COST FORMAT: 0	MIN TOTAL:
LAST RATE: 11/20/2006	PRACTICE: 13	INTRST CODE: 0	FEE MARKUP: %
HOLD FEES:	FEE FREQ: Q2	INT FREE DAY:	COST MARKUP: %
HOLD COSTS:	COST FREQ: Q2	FIXED COSTS: N	FIXED FEES:
TRUST RET ACCT:	TRUST RETAIN:	ARRANGEMENT: H	CURRENCY: USD
			MAXIMUM BILLINGS:

D FILES

Last Bill Date: 08/28/2007

Proforma Operator:
Contact Name: CAROLE PAGANO
Contact Phone: 480 471 8213
Claim Number (mt04):
Date of Loss (mt06): 1976
Final Bill (mt08):
LA matter ID number (mt10):
Type of Claim Number (mt12):
Liability (mt14):
Jurisdiction County (mt16): ALASKA
Defendant Name (mt18):
Status (mt20):
Plaintiff's Atty/OP (mt22):
Docket Number (mt24): 3AN 96 0032
Loss Type Codes Chubb (mt26):
Client City, State (mt28):
Chubb Division Name (mt30):
Chubb Occurrence ID (mt32):

Whitehill Template: STANDARD
Contact Title: TREASURER

Insured Name (mt05):
Policy Number (mt07):
Invoice Sequence (mt09):
Business Unit (mt11):
Claim Severity (mt13):
Jurisdiction State (mt15):
Plaintiff's Name (mt17):
Date Closed (mt19):
Plaintiff's Firm (mt21):
Client Reference # (mt23):
Budget Amount (mt25):
AIG OSOS Number (mt27):
Insured's Deductible (mt29):
Jurisdiction Type (mt31):
TPA Insurer/Client (mt33):

Unallocate Credit Balance: .00

Historical Data:

Date: 10/11/07 PRO FORMA STATEMENT AS OF 10/11/07 FOR FILE 10024978 PROFORMA INDEX#

	Fees	Costs	Totals
Year to Date	53,811.00	4,412.24	58,223.24
History to Date	53,811.00	4,412.24	58,223.24

--Matter Narrative--

INVOICE 659414 CANCELLED DUE TO INCORRECT CUT-OFF DATE. ND 7/2/07

--Client Narrative--

Attorneys at \$180 Paralegals at \$75 Lisa Bruno, 12/06

--TIME ENTRIES--

Index	Init	Date	Stat	Worked		Billed		Cumulative	Description
				Hours	Amount	Hours	Amount		
12019559	JRF	08/06/07	B	0.10	18.00	0.10	18.00	18.00	Receive and review Stratman's answer to Koniag's counterclaim, noting that he is making allegations of fraud on the part of Leisnoi, and assessing whether a motion to strike may be necessary.
TASK:	ACTIVITY:								
12019560	JRF	08/06/07	B	0.10	18.00	0.10	18.00	36.00	Receive and review Stratman's opposition to the federal defendant's motion to stay.
TASK:	ACTIVITY:								
12030756	JRF	08/15/07	B	0.30	54.00	0.30	54.00	90.00	TC with attorney Bruce Landon at the Department of Justice regarding the motion to stay briefing on Stratman's motion to affirm the IBLA panel decision; whether the federal court will require oral arguments; interplay of the state court quiet title case and the federal decertification case, and whether collateral estoppel will attach to the final judgment when entered by Judge Joannides.
TASK:	ACTIVITY:								
12075427	JRF	09/06/07	B	0.20	36.00	0.20	36.00	126.00	Evaluate whether to take any action at this stage of the litigation as to Stratman's allegations of fraud, weighing whether it may be best to await a ruling first on pending motions

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Index	Init	Date	Stat	Worked		Billed		Cumulative	Description
				Hours	Amount	Hours	Amount		
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12075428	JRF	09/06/07	B	0.30	54.00	0.30	54.00	180.00	TC with Collin Middleton regarding Stratman's answer to Koniag's counterclaim in the decertification case; allegations of fraud; whether to move to strike now; Koniag's desire to file its own quiet title case; status of case before Judge Joannides; whether federal court is expected to hold oral arguments on the pending dispositive motions.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12075429	JRF	09/06/07	B	0.20	36.00	0.20	36.00	216.00	TC with Ms. Carole Pagano regarding Stratman's answer raising affirmative defenses of fraud; whether to move to strike; also discussed negotiations with Ward Merdes, and status of the state court quiet title case.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12075432	JRF	09/06/07	B	0.30	54.00	0.30	54.00	270.00	Draft report to the Board on Koniag's counterclaim, Stratman's answer thereto, impact on the case, tactical considerations on whether to move to strike, and how this relates to the case Leisnoi won before the Alaska Supreme Court.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12088594	JRF	09/10/07	B	0.10	18.00	0.10	18.00	288.00	Check federal docket sheet for any new activity by Judge Singleton or by Omar Stratman.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12088757	JRF	09/10/07	B	0.10	18.00	0.10	18.00	306.00	TC with attorney Bruce Landon regarding delay by Judge Singleton in ruling, and it appears increasingly unlikely that decision will be issued before Bruce Landon's retirement from the Dept. of Justice on October 3rd.

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Index	Init	Date	Stat	Worked		Billed		Cumulative	Description
				Hours	Amount	Hours	Amount		
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12110958	JRF	09/27/07	B	1.00	180.00	1.00	180.00	486.00	Study order granting Leisnoi's motion to dismiss Omar Stratman's 2002 federal decertification case, and read the case authorities cited by Judge Singleton, determining that his ruling is favorable, supported by good U.S. Supreme Court and Ninth Circuit jurisprudence, well-reasoned, and likely to withstand any appellate challenge that Stratman might try to mount.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12110959	JRF	09/27/07	B	0.10	18.00	0.10	18.00	504.00	Receive and review Final Judgment in favor of Leisnoi dismissing all of Stratman's claims in the 2002 decertification suit.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12110960	JRF	09/27/07	B	0.20	36.00	0.20	36.00	540.00	Receive and respond to email from Bruce Landon at the Dept. of Justice regarding victory over Stratman just a few days before he retires.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12110961	JRF	09/27/07	B	0.40	72.00	0.40	72.00	612.00	Draft report to the Board of Directors informing them of the good news with Judge Singleton finally throwing Omar Stratman out of federal court after some 30 years of litigation, advising them of the ruling's likely ability to withstand appellate review, and the solid reasoning employed by the judge in affirming the ruling of Secretary Dirk Kempthorne.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12110964	JRF	09/27/07	B	2.60	468.00	2.60	468.00	1080.00	Analyze the Equal Access to Justice Act statute and cases interpreting the Act, evaluating whether under the facts of the decertification case, given that it was the fault of the

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Index	Init	Date	Stat	Worked		Billed		Cumulative	Description
				Hours	Amount	Hours	Amount		
									Department of the Interior in failing to provide Omar Stratman with certified mailing of the pendency of Woody Island's village eligibility that triggered the thirty years of federal litigation, Leisnoi could obtain recovery of attorneys fees from the United States, assessing whether the federal government having also been sued and taken legal positions in the case that supported Woody Island precludes recovery by a co-defendant as against the United States under the Act.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12110965	JRF	09/27/07	B	2.20	396.00	2.20	396.00	1476.00	Legal research and analysis regarding jurisprudence exploring situations under which state laws allowing for recovery of attorneys fees, such as Alaska Civil Rule 82, can be applied to cases pending in federal district court, evaluating whether Leisnoi could obtain recovery of fees from Stratman, determining that in the absence of jurisdiction under 28 U.S.C. 1332, with Stratman having instead invoked 28 U.S.C. 1331, the Ninth Circuit would not allow the use by the district court of the state law such that Leisnoi could not use Rule 82 as a basis of recoverable attorneys fees in the 2002 decertification case.
TASK:	ACTIVITY:			CLARIFICATION:		DECLARED:			
12110966	JRF	09/27/07	B	0.60	108.00	0.60	108.00	1584.00	Lengthy TC with attorney Bruce Landon at the Dept. of Justice regarding the case authorities relied upon by Judge Singleton, his handling of the standard of review issue, discussed research JRF conducted on the Equal Access to Justice Act statute and caselaw, likelihood of an appeal by Stratman, and ability of the opinion to withstand appellate scrutiny.

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Index	Init	Date	Stat	Worked		Billed		Cumulative	Description
				Hours	Amount	Hours	Amount		
TASK:		ACTIVITY:		CLARIFICATION:		DECLARED:			
12110967	JRF	09/27/07	B	0.60	108.00	0.60	108.00	1692.00	Lengthy TC with Collin Middleton regarding the ruling issued by Judge Singleton, whether Judge Singleton's failure to have discussed and analyzed the various subsections of Section 1427 ANILCA could expose the opinion to reversal, options for possible motion practice before the Ninth Circuit if Stratman takes anticipated appeal, and how years of litigation could have been avoided had the court ruled on this statute when Leisnoi and Koniag both raised the issue by motion more than a decade ago.
TASK:		ACTIVITY:		CLARIFICATION:		DECLARED:			
12110980	JRF	09/28/07	B	0.70	126.00	0.70	126.00	1818.00	Researching extent to which Leisnoi could recover in the 2002 decertification case various costs it incurred at the trial of the underlying administrative hearing back in 1998, and whether it could recover huge expenses it incurred over many years of litigation in the predecessor 1976 suit that Judge Singleton seemed in his September 26th order to equate as being one and the same with the 2002 suit.
TASK:		ACTIVITY:		CLARIFICATION:		DECLARED:			
12110981	JRF	09/28/07	B	0.10	18.00	0.10	18.00	1836.00	Receive and review correspondence from David Clark regarding appeal by Stratman from the September 26th ruling by Judge Singleton will prove very difficult for Stratman.
TASK:		ACTIVITY:		CLARIFICATION:		DECLARED:			
12110982	JRF	09/28/07	B	0.40	72.00	0.40	72.00	1908.00	

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Index	Invt	Date	Stat	Worked		Billed		Cumulative	Description
				Hours	Amount	Hours	Amount		
12110983	JRF	09/28/07	B	1.40	252.00	1.40	252.00	2160.00	[REDACTED]
TASK: ACTIVITY: CLARIFICATION: DECLARED:									
12110992	JRF	09/28/07	B	2.40	432.00	2.40	432.00	2592.00	Research exceptions to the so-called "American Rule" that disallows recovery of attorneys fees by the prevailing party in federal court, evaluating a line of cases, including some very helpful United States Supreme Court rulings, permitting recovery of the fees where the losing party engaged in bad faith or oppressive conduct, evaluating Stratman's abuse of the lis pendens, efforts to freeze Leisnoi's bank accounts and to "wipe them off the map" as Schneider stated in oral arguments on April 14, 1995 as plausibly constituting bad faith within the meaning of that line of authority, determining that Leisnoi has a good faith basis to seek recovery for decades of legal costs incurred defending against his decertification claims.
TASK: ACTIVITY: CLARIFICATION: DECLARED:									

Fee Subtotal

2592.00

*-- TIME AND FEE SUMMARY *

TKINIT	Timekeeper	Title	Rate	Hours	Amount
01596	FITZGERALD, JOHN R.	PARTNER	180.00	14.40	2592.00

---COST ENTRIES ---

Index	TTK	Date	Stat	Code	Description	Cost Description	Amount	Voucher	AP Check
6400576	01596	09/27/07	B	118	Lexis	Lexis BATCH #71432	30.64		
					Check No.:	Voucher No.:			

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Index	TTK	Date	Stat Code	Code Description	Cost Description	Amount	Voucher	AP Check
6398866	01112	09/28/07	B	112 Internal Photocopying	Internal Photocopyin INFASELLI DEBRA Pages: 4	0.64		
		Check No.:		Voucher No.:				
6401330	01558	10/02/07	B	112 Internal Photocopying	Internal Photocopyin ROUBIL YOSSTINA Pages: 31	4.96		
		Check No.:		Voucher No.:				
6401331	01112	10/02/07	B	112 Internal Photocopying	Internal Photocopyin INFASELLI DEBRA Pages: 15	2.40		
		Check No.:		Voucher No.:				
6403417	01159	10/04/07	B	112 Internal Photocopying	Internal Photocopyin LEARY JOANNE Pages: 8	1.28		
		Check No.:		Voucher No.:				
6406940	01605	10/10/07	B	112 Internal Photocopying	Internal Photocopyin DAVIS BENJAMIN Pages: 63	10.08		
		Check No.:		Voucher No.:				
6406941	01605	10/10/07	B	112 Internal Photocopying	Internal Photocopyin DAVIS BENJAMIN Pages: 21	3.36		
		Check No.:		Voucher No.:				
6406942	01605	10/10/07	B	112 Internal Photocopying	Internal Photocopyin DAVIS BENJAMIN Pages: 24	3.84		
		Check No.:		Voucher No.:				
6406943	01605	10/10/07	B	112 Internal Photocopying	Internal Photocopyin DAVIS BENJAMIN Pages: 14	2.24		
		Check No.:		Voucher No.:				
6406944	01605	10/10/07	B	112 Internal Photocopying	Internal Photocopyin DAVIS BENJAMIN Pages: 203	32.48		
		Check No.:		Voucher No.:				
6406945	01456	10/10/07	B	112 Internal Photocopying	Internal Photocopyin WEDGE JULIE Pages: 66	10.56		
		Check No.:		Voucher No.:				
6406946	01456	10/10/07	B	112 Internal Photocopying	Internal Photocopyin WEDGE JULIE Pages: 10	1.60		
		Check No.:		Voucher No.:				

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Index	TTX	Date	Stat. Code	Code Description	Cost Description	Amount	Voucher	AP Check
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104.08

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----- COST CODE SUMMARY-----

----- COST CODE -----	AMOUNT
112 Internal Photocopying	73.44
118 Lexis	30.64
COST TOTAL	104.08

BALANCE DUE FROM PREVIOUS STATEMENT	30324.83
LESS PAYMENT(S)	0.00
BALANCE FORWARD	30324.83
TIMECARD SUB-TOTAL (14.40)	2592.00
DISBURSEMENT SUB-TOTAL	104.08
SUBTOTAL CURRENT PERIOD	2696.08
TOTAL DUE	33020.91
TIME VALUE FOR THE MATTER AFTER THE CUTOFF DATE	0.00
COST VALUE FOR THE MATTER AFTER THE CUTOFF DATE	0.00

LEDGER SUMMARY: ALL OPEN INVOICES AND INVOICES SINCE 01/01/1996

INVOICE	DATE	FEES	COSTS	OTHER	PAYMENT	DATE	FEES	COSTS	OTHER	BALANCE
659417	06/30/07	19638.00	364.60	.00			.00	.00	.00	20002.60
663060	08/28/07	7605.00	2717.23	.00			.00	.00	.00	10322.23

Multi Payor Information:

Client

% Split Amt. Due This Bill

() BILL COSTS AND FEES

() BILL FEES ONLY

() BILL COSTS ONLY

() DO NOT BILL

() CLOSE FILE

() FINAL BILL